

IN the UNITED STATES DISTRICT  
Court for the WESTERN DISTRICT  
of TEXAS WACO DIVISION

FILED

APR 13 2012

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY [Signature] DEPUTY CLERK

TROY DANIEL SNYDER

TDCS #1526319  
plaintiff,

V

ROBERT DILLARD AND

JASON DAVID WATSON  
defendants.

Civil NO. W-09-CA-254

PLAINTIFF'S EXPLANATION of HIS DE NOVO REVIEW MOTION

TO THE HONORABLE JUDGE WALTERS, SMITH, JR.:

COMES NOW, Plaintiff SNYDER, and files this motion  
to clear up any confusion caused by his earlier motion.

I

SNYDER is a state prisoner at the Ramsey Unit in Rosharon,  
TEXAS. Due to prison regulations, SNYDER is NOT ALLOWED  
to receive video Tapes, compact discs and/or digital video  
discs and is not allowed to possess them.

II

SNYDER'S earlier motion was a request for a Factual  
description on paper (similar to a Court Reporter's Record)  
of each and every event depicted on the patrol car videos

from the night of the incident. SNYDER needs this information in order to prepare for the trial of this case.

### III

SNYDER request for a written description of the events on the DVD for the night in question or, IN THE ALTERNATIVE, for this Court to have a copy of the DVD sent to MRS. Leicht, Law Librarian, 1100 FM 655 - RAMSEY UNIT Rosharon, TX 77583-7670 with an ORDER for MRS. Leicht to allow SNYDER to view, AND MAKE notes from the DVD for trial preparation, on prison equipment and under MRS. Leicht's supervision, the DVD that has the videos from all patrol cars on the night of the incident. SNYDER will not have equal access to evidence to prepare for the trial in this case otherwise and will suffer irreparable harm thereby.

### IV

SNYDER reiterates his earlier request for appointment of counsel in this case. Even a simple matter like viewing video records to prepare for trial is beyond SNYDER's ability due to the many prison regulations apparently unknown to Plaintiff's counsel and this Court.

WHEREFORE, Premises considered, SNYDER respectfully moves and Prays for this Court to cause him to be furnished with a detailed, written account of everything on all patrol car video accounts the subject of this suit or to cause a copy of the lost DVD to be

Sent to the Ramsey prison UNIT's Law Librarian with a Court Order for Snyder to be allowed to view said DVD under prison staff supervision as much as Snyder needs to in order to take notes to prepare for the trial in this case; AND, to Appoint Counsel for Snyder to assist Snyder to prepare this case and present it at trial.  
SO RESPECTFULLY MOVED AND PRAYED FOR.

respectfully Submitted,

April 10<sup>th</sup>, 2012  
EXECUTED ON

Troy Daniel Snyder  
TROY D. SNYDER #1526319  
RAMSEY UNIT  
1100 FM 655,  
ROSHARON, TX 77583-7670

DECLARATION

I TROY Daniel SNYDER, prisoner #1526319, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the Above and following are all True and Correct.

April 10<sup>th</sup> 2012  
EXECUTED ON

Troy Daniel Snyder  
TROY D. SNYDER #1526319

Certificate of Service

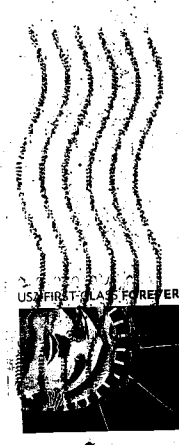
This is to certify that a true and correct copy of the above was sent to NAMAN, Howell, Smith & Lee LLC via first class mail, postage paid, on the date below.

April 10<sup>th</sup> 2012  
EXECUTED ON

Troy Daniel Snyder  
TROY D. SNYDER #1526319

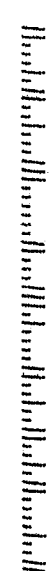
Troy Snyder #1526319  
Ramsey L WIT  
100 FM 655  
Rosharon, TX, 77583-7670

HOUSTON TX 773  
11 APR 2012 PM 4 L



UNITED STATES District Court for the  
Western District of TEXAS  
U.S. District Clerk's Office  
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